



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Gino BADOLATI,

Defendant,

Mag. Case Number: _____

COMPLAINT FOR VIOLATION OF

Title 21, U.S.C., Sections 952 and 960
Importation of a Controlled Substance

14 MJ0353

The undersigned complaint being duly sworn states:

On or about January 29, 2014, within the Southern District of California, Gino BADOLATI, did knowingly and intentionally import approximately 76.90 kilograms of marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof; in violation of Title 21, United States Code, Sections 952 and 960.

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.



Border Patrol Agent Nelson Torres
Customs Border Protection

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 30TH DAY OF
January, 2014.



MAGISTRATE JUDGE

United States of America

vs.

BADOLATI, Gino

STATEMENT OF FACTS

On January 29, 2014, at approximately 1958 hours, Gino BADOLATI attempted to enter the United States at the San Ysidro Port of Entry, San Diego, CA as the driver and sole occupant of a green 1996 Jeep Cherokee bearing license plate CA/US 5CSV656. A Customs and Border Protection (CBP) canine alerted to the vehicle for the presence of narcotics. A CBP Officer received two negative customs declarations from BADOLATI. BADOLATI presented his valid US passport card as his entry document. BADOLATI and his vehicle were referred to secondary inspection where a CBP Officer examined the vehicle and discovered that packages were concealed inside the gas tank and rear seat. The inspection resulted in the seizure of approximately 76.90 kilograms (40 packages) of a green leafy substance that field-tested positive for the properties of marijuana.

BADOLATI was arrested for violating Title 21 United States Codes 952 & 960, Importation of a Controlled Substance. BADOLATI was booked into the Metropolitan Correctional Center, San Diego, CA.